

MELINDA HAAG (CABN 132612)  
United States Attorney

DAVID R. CALLAWAY (CABN 121782)  
Chief, Criminal Division

PHILIP KOPCZYNSKI (NYBN 4627741)  
Special Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-6471  
Facsimile: (415) 436-7027  
philip.kopczynski@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No. CR 15-284 WHA
	)	
Plaintiff,	)	STIPULATION TO CONTINUE
	)	STATUS HEARING AND
v.	)	TO EXCLUDE TIME UNDER
	)	SPEEDY TRIAL ACT;
ABEL ANTONIO ALARCON,	)	<del>PROPOSED</del> ORDER
	)	
Defendant.	)	
	)	

**STIPULATION**

The United States of America, by and through Special Assistant United States Attorney Philip Kopczynski, and Defendant Abel Antonio Alarcon, by and through Assistant Federal Public Defender Candis Mitchell, hereby stipulate that, with the Court's approval, the status hearing currently scheduled for June 16, 2015 at 2:00 p.m. should be continued to June 30, 2015 at 2:00 p.m., and the time between June 16, 2015 and June 30, 2015 is excludable under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), for continuity of counsel. The reason for this requested continuance is that government

///

///

///

STIP. AND ~~PROPOSED~~ ORDER  
NO. CR 15-284 WHA

counsel will be in Washington, D.C. on June 16, 2015, and in San Jose appearing before the Honorable Nathanael M. Cousins on the following Tuesday, June 23, 2015.

IT IS SO STIPULATED.

Dated: June 10, 2015

\_\_\_\_\_/s/\_\_\_\_\_  
PHILIP KOPCZYNSKI  
Special Assistant United States Attorney

Dated: June 10, 2015

\_\_\_\_\_/s/\_\_\_\_\_  
CANDIS MITCHELL  
Assistant Federal Public Defender

**~~PROPOSED~~ ORDER**

GOOD CAUSE APPEARING, upon stipulation of the parties,

THE COURT FINDS that government counsel is unavailable to appear at the status hearing set for June 16, 2015 at 2:00 p.m.

THE COURT FURTHER FINDS that failing to exclude the time between June 16, 2015 and June 30, 2015 would unreasonably deny the government continuity of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).


THE COURT FURTHER FINDS that the ends of justice served by excluding the time between June 16, 2015 and June 30, 2015 from computation under the Speedy Trial Act outweigh the interests of the public and the defendant in a speedy trial.

THEREFORE, IT IS HEREBY ORDERED that the status hearing set for June 16, 2015 at 2:00 p.m. shall be continued to June 30, 2015 at 2:00 p.m.

IT IS FURTHER ORDERED that the time between June 16, 2015 and June 30, 2015 shall be excluded from computation under the Speedy Trial Act.

IT IS SO ORDERED.

Dated: June 10, 2015

  
\_\_\_\_\_  
THE HONORABLE WILLIAM ALSUP  
United States District Judge